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8 the Bankruptcy Estate of the  
Litigation Practice Group P.C.  
9 and Liquidating Trustee of the  
LPG Liquidation Trust

10 UNITED STATES BANKRUPTCY COURT  
11  
12 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

13  
14 In re

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16  
17 THE LITIGATION PRACTICE GROUP P.C.,  
18 Debtor.

Case No: 8-23-bk-10571-SC

Chapter 11

STIPULATION TO MODIFY BRIEFING  
SCHEDULE AND TO CONTINUE  
HEARING ON MOTION FOR  
ALLOWANCE OF ADMINISTRATIVE  
EXPENSE CLAIM FILED BY UNITED  
PARTNERSHIPS, LLC [DK. NO 671]

Current Hearing and Response Dates

Hearing Date: December 17, 2025

Trustee's Response Due: December 3, 2025

Reply by Claimant Due: December 10, 2025

Time: 1:30 p.m.

Ctrm: Courtroom 5C

411 West Fourth Street

Santa Ana, CA 92701

Proposed Hearing and Response Dates

**Hearing Date: March 18, 2026**

Trustee's Response Due: March 4, 2026

Reply by Claimant Due: March 11, 2026

Time: 1:30 p.m.

Ctrm: Courtroom 5C

411 West Fourth Street

Santa Ana, CA 92701

1 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,  
2 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

3 Richard A. Marshack, the duly appointed Chapter 11 Trustee (“Trustee”) for the estate  
4 (“Estate”) of The Litigation Practice Group, P.C. (“Debtor” or “LPG”) and liquidating trustee of the  
5 LPG Liquidation Trust (collectively, “Trustee”), and United Partnerships, LLC (“UP” and together  
6 with Trustee, “Parties”) with regard to the following:

7 **RECITALS**

8 A. On March 20, 2023, the Debtor filed a voluntary petition under Chapter 11 of Title 11  
9 of the United States Code, initiating bankruptcy Case No. 8:23-bk-10571-SC in the United States  
10 Bankruptcy Court for the Central District of California, Santa Ana Division.

11 B. On May 8, 2023, Richard A. Marshack was appointed as the Chapter 11 Trustee of  
12 the Estate. Docket No. 65.

13 C. On November 16, 2023, UP filed a Motion for Allowance of Administrative Claim  
14 Pursuant to 11 U.S.C. § 503 (“Motion”). Docket No. 671.

15 D. On January 5, 2024, Trustee filed a Motion to Continue Hearing on the motions for  
16 allowance of administrative expense claims. Docket No. 816.

17 E. On January 8, 2024, the Court entered an Order granting the Trustee’s Motion to  
18 Continue Hearing, continuing the initial hearings on all matters to February 29, 2024, and treating  
19 those hearings as status conferences. Docket No. 818.

20 F. On February 15, 2024, Trustee filed an Omnibus Unilateral Report Regarding Status  
21 of Motions for Allowance of Administrative Expense Claim Under 11 U.S.C. Section 503(b).  
22 Docket No. 940.

23 G. On March 6, 2024, the Court entered a Scheduling Order, setting April 11, 2024, as  
24 the deadline for Trustee to respond to any of the motions for allowance of administrative expense  
25 claims for a specific group of claimants, including UP. Docket No. 986.

26 H. On April 4, 2024, the Parties entered into a Stipulation to Modify the Briefing  
27 Schedule and Continue Hearing on Motion for Allowance of Administrative Expense Claim filed by  
28 United Partnerships, LLC. (“April 4 Stipulation”). Docket No. 1087.

1 I. On April 5, 2024, the Court entered an order approving the April 4 Stipulation.  
2 Docket No. 1089.

3 J. Thereafter, the Court entered orders approving further stipulations between Trustee  
4 and UP to continue the hearing on the Motion. *See* Docket Nos. 1188, 1265, 1422, 1812, 1940,  
5 2059, 2141, 2414, 2464.

6 K. The hearing is currently scheduled for December 17, 2025, at 1:30 p.m.

7 L. The Trustee has continued diligently investigating UP's claim. Trustee has requested  
8 further documentation from UP, specifically documentation tracing the benefit it provided to the  
9 Debtor's Estate. The Trustee is concurrently investigating post-petition payments the Debtor made  
10 to UP and any possible related avoidance power claims.

11 M. In light of their ongoing investigations, the Parties have agreed to a further  
12 continuance of the hearing on the Motion and related briefing schedule by approximately 91 days.

13 The Parties STIPULATE as follows:

14 1. The hearing on the Motion shall be continued from December 17, 2025 at 1:30 p.m.,  
15 to March 18, 2026, at 1:30 p.m.

16 2. The deadline for Trustee to file a response to the Motion shall be extended through  
17 and including March 4, 2026.

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1           3.       The deadline for UP to file a reply to Trustee's response to the Motion shall be  
2 extended through and including March 11, 2026.

3           4.       This Stipulation may be executed in one or more counterparts, and facsimile or  
4 electronic signatures may be used in filing this document with the Court.

5  
6 DATED: November 24, 2025

MARSHACK HAYS WOOD LLP

/s/ Aaron E. de Leest

By: \_\_\_\_\_

D. EDWARD HAYS

AARON E. DE LEEST

ALINA MAMLYUK

Attorneys for Chapter 11 Trustee,

RICHARD A. MARSHACK

11           *December 21, 2025*  
12 DATED: ~~November 24, 2025~~

GOLDEN GOODRICH LLP

By: \_\_\_\_\_

DAVID M. GOODRICH

Attorneys for

UNITED PARTNERSHIPS, LLC

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **STIPULATION TO MODIFY BRIEFING SCHEDULE AND TO CONTINUE HEARING ON MOTION FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM FILED BY UNITED PARTNERSHIPS, LLC** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **December 1, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On **December 1, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR – MAIL REDIRECTED TO TRUSTEE**

THE LITIGATION PRACTICE GROUP P.C.

17542 17TH ST

SUITE 100

TUSTIN, CA 92780-1984

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **December 1, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA PERSONAL DELIVERY**

PRESIDING JUDGE'S COPY

Honorable Scott C. Clarkson

Bin beside 5th Floor Elevators

U.S. Bankruptcy Court, Ronald Reagan Federal Building

411 West Fourth Street

Santa Ana, CA 92701-4593

**VIA EMAIL**

**MONITOR**

Nancy Rapoport

[nancy.rapoport@unlv.edu](mailto:nancy.rapoport@unlv.edu)

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 1, 2025

Date

Cynthia Bastida

Printed Name

/s/ Cynthia Bastida

Signature

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.



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